

**UNITED STATES DISTRICT COURT**  
 for the  
**Eastern District of Michigan**

United States of America

v.

Travis Henry Timmons

Case No. Case: 2:21-mj-30063  
 Assigned To : Unassigned  
 Assign. Date : 2/4/2021  
 USA V. SEALED MATTER (CMP)(CMC)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 2020 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC § 2251(a)	Production of child pornography
18 USC § 2252A(a)(5)	Possession of child pornography
18 USC § 2422(b)	Coercion and enticement of a minor to engage in unlawful sexual activity

This criminal complaint is based on these facts:  
 see attached affidavit.

Continued on the attached sheet.

Sworn to before me and signed in my presence  
 and/or by reliable electronic means.

Date: February 4, 2021

City and state: Detroit, Michigan

  
Complainant's signature

Raymond C. Nichols, Special Agent (FBI)  
Printed name and title

  
Judge's signature

Hon. R. Steven Whalen, United States Magistrate Judge  
Printed name and title

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR**  
**COMPLAINT AND ARREST WARRANT**

I, Raymond C. Nichols, having been first duly sworn, do hereby depose and state as follows:

**I. INTRODUCTION**

1. I have been employed as a Special Agent of the FBI since February of 2012. I am currently assigned to the FBI Detroit Division. As a Special Agent, I investigate federal criminal violations related to internet fraud, computer intrusions, and the FBI's Innocent Images National Initiative, which investigates matters involving the online sexual exploitation of children. I am currently assigned to the Southeast Michigan Trafficking and Exploitation Crimes Task Force (SEMTEC). I have gained experience through training at the FBI Academy, post Academy training, and everyday work related to conducting these types of investigations. Before joining the FBI, I obtained a bachelor's degree in computer information systems and was employed as a network/server administrator for approximately nine years.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for **TRAVIS HENRY TIMMONS** (date of birth \*\*/\*\*/1989) for violating 18 U.S.C. § 2251(a) - production of child pornography (including attempt), 18 U.S.C. § 2252A(a)(5) - possession of child pornography, and 18 U.S.C. § 2422(b) - coercion and enticement of a minor (including attempt).

3. The statements contained in this affidavit are based in part on written reports from other law enforcement agents, independent investigation and analysis by law enforcement officers/analysts, and my experience, training, and background as a Special Agent (SA) with the FBI. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to law enforcement concerning this investigation. The facts set forth establish probable cause that TIMMONS has violated Title 18 U.S.C. § 2251(a), 18 U.S.C. § 2252A(a)(5), and 18 U.S.C. § 2422(b).

## **II. PROBABLE CAUSE**

4. On August 18, 2020 the Gibraltar Police Department, located in Gibraltar, Michigan, County of Wayne, responded to a report of inappropriate social media messages from the parent of MV1. MV1 is a 13 year old female who resides in Woodhaven, which is in the Eastern District of Michigan.

5. The mother of MV1 told Gibraltar Police that MV1 and her friend, MV2, who is a 11 year old female residing in Gibraltar, Michigan, which is also in the Eastern District of Michigan, were communicating with a boy named Chase through the internet-based social media application Instagram. Chase's Instagram user name was bet.itz.chase.dakid. MV1 and MV2 have also communicated with Chase via his telephone number 734-489-\*\*\*\*.

6. On August 18, 2020 a Detective with the Gibraltar Police Department interviewed MV1 with her mother, who indicated that MV1 met Chase on Instagram and had messaged him for a few weeks. MV1 had never seen Chase in person or on video. Chase told MV1 that he was 18 years old, but she believed him to be much older after speaking with him via telephone. Chase asked MV1 for naked pictures, and she sent him a nude picture of her buttocks. The chats and image were provided to the Gibraltar Police Department. The image appears to show MV1 wearing a shirt, no pants. Her bare buttocks is exposed to the camera and appears to be a “selfie” taken in a mirror.

7. On August 20, 2020 a Detective with the Gibraltar Police Department interviewed MV2, who stated that she met Chase through Instagram and had messaged him before MV1. MV2 would use the internet-based social media application TikTok to make videos, and Chase would watch. On August 17, 2020 MV2’s friend used MV1’s cellular telephone to tell Chase that MV1 would “fuck” Chase for vape pens. Vape pens are an alternative to cigarettes which contain nicotine. Chase accepted the offer and sent a photo of the vape pens behind a BP gas station located at Jefferson and Gibraltar Road in Gibraltar, Michigan. A friend picked up the vape pens and returned them to the BP gas station in an apparent attempt to determine the true identity of Chase.

8. On August 20, 2020 a Detective with the Gibraltar Police Department spoke with the manager of the BP gas station regarding the vape pens. The manager recalled that a man returned 2 vape pens to an employee behind the cash register on August 17, 2020. The only two employees in the BP gas station on August 17, 2020 were the employee behind the cash register and “Travis” who worked at the Tubby’s sub shop, located in the BP gas station. “Travis” was known to the Gibraltar Police Department as TRAVIS HENRY TIMMONS.

9. On August 26, 2020 the Gibraltar Police Department submitted a search warrant to Facebook for Instagram account bet.itz.chase.dakid. Facebook is the parent company for Instagram.

10. On September 21, 2020 the Gibraltar Police Department received a call from the mother of MV1 who told them that Chase was messaging MV1 with screen shots of her nude photos.

11. On September 28, 2020 the Gibraltar Police Department received a response to the search warrant served to Facebook for Instagram account bet.itz.chase.dakid. The response included an IP address used to access the account, which was 2601:40f:c180:2650:69df:8855:61dc:44c3. The IP address was determined to be serviced by Comcast.

12. On September 30, 2020 the Gibraltar Police Department served a search warrant to Comcast seeking information on the customer assigned IP address 2601:40f:c180:2650:69df:8855:61dc:44c3. On October 19, 2020 a response was received which disclosed that the IP address was assigned to a customer at an address in Gibraltar, Michigan. The Gibraltar Police Department was aware that TRAVIS HENRY TIMMONS resided at that address.

13. On October 27, 2020 the Gibraltar Police Department served a search warrant at TIMMONS's residence, Gibraltar, Michigan. During the service of the search warrant an individual ("Witness 1") was located in the residence. Witness 1 agreed to be interviewed and indicated that he/she was aware that TRAVIS HENRY TIMMONS had exploited minors "a long time ago". Witness 1 had previously seen a photo of a young girl's "butt" on TIMMONS's phone. Witness 1 further indicated that TIMMONS had taken a video and screenshot of Witness 1's step-niece's vagina and that Witness 1 saw it on TIMMONS's phone. Witness 1 stated that Witness 1's step-niece was 6 years old at the time. Witness 1 did not know if TIMMONS still had the photo on his phone. A journal located at the residence corroborated Witness 1's statement.

14. On October 27, 2020 while a search warrant was being executed at TIMMONS's residence in Gibraltar, Michigan, a search warrant was executed on the person of TRAVIS HENRY TIMMONS, who was located nearby. TIMMONS

was in possession of an LG smartphone, model LM-X320, IMEI 358335-10-426996-2, which was associated with telephone number 734-489-\*\*\*\*. A label affixed to the device indicated that it was made in Vietnam.

15. On December 9, 2020 the LG smartphone was turned over to the Michigan State Police Internet Crimes Against Children Unit in Livonia, Michigan for examination. On December 10, 2020 the device and extracted data was turned back over to the Gibraltar Police Department.

16. On January 27, 2021, MV3, a 14 year old female from Riverview, Michigan, which is in the Eastern District of Michigan, was forensically interviewed. MV3 disclosed that her “ex”, Chase was in jail. MV3 met Chase on Instagram and dated online for several months. Chase used Instagram account bet.itz.chase.dakid. MV3 had sent nude images to Chase at his request, and later learned that the photos on his Instagram account were not really of him during a video chat. MV3’s mother logged into MV3’s Instagram account and located a collage of 12 images of MV3 which were sent to Chase. Approximately 3 of the images contained on the collage appeared to depict MV3’s bare breasts.

17. On January 29, 2021 I met with Detective Lieutenant Bruce Bullard of the Gibraltar Police Department. Detective Bullard provided me with a briefing of the case, as well as police reports, search warrants, and data recovered from the LG smartphone belonging to TRAVIS HENRY TIMMONS. I have reviewed the

information in its entirety and observed numerous photos of clothed female children's bottoms which appeared to be taken at public parks, ice cream shops, and other businesses. In addition to those photos, I observed images and videos that appeared to meet the Federal definition of child pornography.

18. The following videos located on the LG smartphone belonging to TRAVIS HENRY TIMMONS (in his possession at the time of seizure) appeared to meet the Federal definition of child pornography:

- a. 20200824\_072239.mp4 – This approximate 47 second video depicts TRAVIS HENRY TIMMONS whose face is exposed to the camera and a small female child who is laying down, apparently asleep, wearing pajamas. TIMMONS places his bare penis against the child's buttocks and simulates sexual intercourse with the child. Metadata contained in the video indicates that it was produced on August 24, 2020 with an LM-X320.
- b. 20200824\_070624.mp4 – This approximate 32 second video appears to depict the same child as above, wearing the same pajamas. An adult hand is shown rubbing her vaginal area through her clothes. Metadata contained in the video indicates that it was produced on August 24, 2020 with an LM-X320.
- c. 20200824\_074214.mp4 – This approximate 13 second video appears to depict the same child as above, wearing the same pajamas. A bare penis is depicted being rubbed on her buttocks. Metadata contained in the video indicates that it was

produced on August 24, 2020 with an LM-X320.

d. 20200825\_084105.mp4 – This approximate 3 minute 22 second video depicts an adult male, believed to be TRAVIS HENRY TIMMONS, placing a recording device on the floor of a bathroom. A young child then enters and begins to change clothes. The child removes her underwear and bends over, exposing her bare buttocks and vaginal area to the camera. Metadata contained in the video indicates that it was produced on August 25, 2020 with an LM-X320.

19. On December 21, 2020 a Detective with the Gibraltar Police Department showed a photo of the child depicted in the videos described in paragraph 18 to an adult female who resided at TIMMONS'S RESIDENCE in Gibraltar, Michigan with TRAVIS HENRY TIMMONS. The female identified the child as a 7 year old family member, hereafter MV4.

20. All of the above described activity occurred in the Eastern District of Michigan utilizing a means or facility of interstate commerce. MV1-MV4 are all residents of the Eastern District of Michigan, as is TRAVIS HENRY TIMMONS. The videos of MV4 were taken at TIMMONS'S RESIDENCE Gibraltar, Michigan.

### III. CONCLUSION

21. Probable cause exists that TRAVIS HENRY TIMMONS violated 18 U.S.C. § 2251(a) - production of child pornography (including attempt), 18 U.S.C. § 2252A(a)(5) - possession of child pornography, and 18 U.S.C. § 2422(b) - coercion and enticement of a minor (including attempt).

Respectfully submitted,



Raymond C. Nichols, Special Agent  
Federal Bureau of Investigation

Sworn to before me and signed in my presence and/or by reliable electronic means.



HON. R. STEVEN WHALEN  
UNITED STATES MAGISTRATE JUDGE

Dated: February 4, 2021